

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
(Indianapolis Division)**

RED BARN MOTORS, INC.,	*	DOCKET NO. 1:14-cv-01589-TWP-DKL
PLATINUM MOTORS, INC.,	*	
MATTINGLY AUTO SALES, INC.,	*	
YOUNG EXECUTIVE MANAGEMENT	*	
& CONSULTING SERVICES, INC.,	*	
Individually, and on behalf of other	*	
members of the general public	*	
similarly situated	*	
	*	
v.	*	
	*	
COX ENTERPRISES, INC.,	*	
COX AUTOMOTIVE, INC.,	*	
NEXTGEAR CAPITAL, INC.,	*	
F/K/A DEALER SERVICES	*	
CORPORATION, successor by merger	*	
with Manheim Automotive Financial	*	
Services, Inc., and JOHN WICK	*	
	*	

MOTION TO APPEAR *PRO HAC VICE*

NOW INTO COURT, pursuant to S.D. Ind. Local Rule 83-6(a), comes Jacob A. Airley who respectfully requests entry of an Order granting leave to appear *pro hac vice* for the purpose of appearing as counsel on behalf of Plaintiffs, Red Barn Motors, Inc., Platinum Motors, Inc., Mattingly Auto Sales, Inc., and Young Executive Management & Consulting Services, Inc., in the above-styled cause only. In support of this motion, the undersigned states:

1.

I am admitted to practice and in good standing (*i.e.*, currently authorized to practice as an attorney) in the following United States courts and state's highest courts: the Louisiana Supreme Court (2002), the United States District Court for the Eastern District of Louisiana (2003), United

States District Court for the Middle District of Louisiana (2003) and the United States Court for the Western District of Louisiana (2003).

2.

I have never been disbarred or suspended from practice before any court, department, bureau, or commission of any state of the United States. I have never received a reprimand or been subject to other disciplinary action from any such court, department, bureau, or commission pertaining to conduct or fitness as a member of the bar.

3.

I certify that I have reviewed the *Seventh Circuit Standards of Professional Conduct* and the Local Rules of this court, including the Rules of Disciplinary Enforcement, and that I will abide by these rules and standards.

4.

I have submitted a check in the amount of One Hundred and 00/100 Dollars (\$100.00) to the Clerk of this Court in payment of the administrative fees required to process this motion for admission *pro hac vice*.

WHEREFORE, Jacob A. Airey respectfully requests that this Court enter an order granting leave to appear *pro hac vice* for the purposes of this cause only.

Respectfully submitted,

/s/ Jacob A. Airey
JACOB A. AIREY
(La. Bar No. 27933)
**SHER GARNER CAHILL RICHTER
KLEIN & HILBERT, L.L.C.**
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New Orleans, Louisiana 70112
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jairey@shergarner.com
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I do hereby certify that I have, on the 8th day of November, 2016, served a copy of the foregoing upon all counsel of record by CM/ECF filing.

/s/ Jacob A. Airey
JACOB A. AIREY